

Exhibit 1

to Declaration of Robert W. Fuller

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11 SOUTHEASTERN CONFERENCE

12 **UNITED STATES DISTRICT COURT**
13 **NORTHERN DISTRICT OF CALIFORNIA**
14 **OAKLAND DIVISION**

15
16 IN RE COLLEGE ATHLETE NIL
LITIGATION

Case No. 4:20-cv-03919-CW

17 **DECLARATION OF CHARLIE HUSSEY**
18 **(SOUTHEASTERN CONFERENCE) IN**
SUPPORT OF JOINT
19 **ADMINISTRATIVE OMNIBUS MOTION**
TO SEAL

20
21 I, Charlie Hussey, declare that the following is true:

22 1. I am the Chief Operating Officer (“COO”) and Deputy Commissioner of the
23 Southeastern Conference (“SEC” or the “Conference”). I make this declaration of my own
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1 personal knowledge and, if called on to do so, could testify competently to the facts stated herein
2 under oath.

3 2. I have been employed by the SEC in various capacities since 2000. From 2013 to
4 2020, I served as the SEC's Associate Commissioner for Network Relations. In 2017, I became
5 the SEC's COO. Since 2020, I have also served as Deputy Commissioner of the SEC.

6 3. In my capacity as COO and Deputy Commissioner, I am the Conference's primary
7 liaison with ESPN, CBS, and the SEC Network for all television, licensing, broadcast media, and
8 sponsorship matters. As a result, I have participated in the negotiation of and have detailed
9 knowledge regarding the terms of the Conference's broadcast media agreements with CBS and
10 ESPN, as well as the SEC's agreement with ESPN concerning sponsorships. I also have
11 knowledge of the SEC's agreements related to its member schools' participation in and the
12 broadcast of the College Football Playoff ("CFP") and of the SEC's other contracts and potential
13 commercial contracts, including licensing agreements.

14 4. In addition, I am familiar with the SEC's financial statements and reporting,
15 including the information in the SEC's annual audited financial statements.

16 5. I make this declaration in support of the parties' Joint Administrative Omnibus
17 Motion to Seal (ECF No. 318), filed on September 15, 2023 (the "Motion"), and as contemplated
18 by the Stipulation and Order as Modified Modifying Sealing Procedures Relating to Class
19 Certification Briefing and Related Documents (ECF No. 207).

20 6. I understand that a party seeking to file a document under seal must "establish that
21 a document, or portions thereof, are sealable." Civil L.R. 79-5(c). In connection with class
22 certification motions, I understand that courts generally require a designating party to demonstrate
23 that "compelling reasons" exist to protect the information from being disclosed. *Kamakana v.*
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1 *City & Cnty. of Honolulu*, 447 F.3d 1172, 1178-79 (9th Cir. 2009); *IntegrityMessageBoards.com*
 2 *v. Facebook, Inc.*, No. 18-cv-05286-PJH, 2021 WL 3771785, at *21 (N.D. Cal. Aug. 24, 2021).

3 7. The SEC considers certain information included in the parties' various filings in
 4 support of and in opposition to the Plaintiffs' motion for class certification and related expert
 5 materials to be confidential, proprietary, and competitively sensitive information belonging to the
 6 SEC. The SEC therefore requests that the portions of the parties' filings containing the SEC's
 7 confidential information, set forth in detail on Exhibit 1 to this Declaration, be maintained and
 8 filed under seal.

9 8. The information that the SEC is requesting that the Court maintain and file under
 10 seal is narrowly tailored and redacted, and the SEC can demonstrate that compelling reasons
 11 exist to maintain these narrowly tailored redactions under seal. The information that the SEC
 12 seeks to seal generally falls into the following categories:

- 13 a. Confidential, competitively sensitive terms and provisions of the SEC's
 14 broadcast media agreements, which are highly negotiated and, to the best of
 15 my knowledge, unique to the SEC;
- 16 b. Confidential, competitively sensitive terms and provisions of the SEC's actual
 17 or potential contractual relationships with third-party commercial entities, such
 18 as licensing and sponsorship agreements, which are highly negotiated and, to
 19 the best of my knowledge, unique to the SEC; and
- 20 c. Confidential, competitively sensitive business and financial information,
 21 including financial statements, that would harm the SEC's competitive
 22 standing if made publicly available.

23 9. I understand that the SEC's broadcast media agreements produced in this case are
 24 subject to confidentiality protections through the Stipulated Protective Order (ECF No. 137), as

1 supplemented and amended (ECF No. 148) (together, the “Protective Order”), entered in this
2 case and have been designated “Network Strictly Confidential – Outside Litigation Counsel
3 Only” pursuant to that Protective Order to preserve their confidentiality.

4 10. I further understand that the SEC’s financial documents, including its annual
5 audited financial statements, produced in this case are similarly subject to confidentiality
6 protections through the Protective Order and have been designated “Network Strictly
7 Confidential – Outside Litigation Counsel Only” pursuant to that Protective Order, again to
8 preserve their confidentiality.

9 11. The SEC’s broadcast media agreements are confidential and proprietary because
10 each of the provisions in those agreements are highly negotiated and, to the best of my
11 knowledge, unique to the SEC. If the provisions or terms of these agreements became public, the
12 SEC would be prejudiced when it attempts to negotiate media rights agreements in the future. In
13 addition, to the extent that the SEC may seek to modify (formally or informally) specific
14 provisions in its broadcast media agreements, the SEC could also be prejudiced. (These
15 renegotiations or modifications occur from time to time during the multi-year terms of the
16 broadcast media agreements.)

17 12. In negotiations, a media entity may agree to compromise on certain provisions if
18 the SEC will compromise on others, such that all provisions of the broadcast media agreements
19 are interrelated to a significant degree. Terms that have no specific monetary value assigned in
20 an agreement are material in negotiations because obtaining concessions on non-monetary terms
21 compromises the SEC’s position on monetary terms. For example, obtaining commitments from
22 a network to broadcast or otherwise distribute a large number of games and events, particularly
23 in sports that do not garner high ratings and substantial viewership, may necessitate compromises
24 on other monetary and non-monetary terms. The negotiations are always complicated, with

1 many variables. Obtaining a commitment to broadcast or distribute a game or event via digital
2 distribution on the internet, or on an “app,” may be easier than obtaining a commitment for
3 distribution on a regional cable network, which may be easier than obtaining a commitment for
4 distribution on a national cable network (with no other games on the network in other parts of the
5 country), which may be easier than obtaining a commitment for over-the-air (*e.g.*, CBS, NBC,
6 ABC, or FOX) distribution on a regional (multiple games from different conferences in different
7 regions), split national (only two games) or true national (only one game, throughout the country)
8 basis. Other terms that are often negotiated, and that are inextricably interrelated to each other
9 and to the ultimate rights fee paid, include: the number and timing of commercial breaks; the
10 time windows and dates when games will be broadcast or distributed; the rights to be licensed
11 (*i.e.*, which games are included); ownership of the copyrights to broadcasts (sole, split, or
12 licensed back to the network with or without restrictions, with or without limitations on the
13 platforms on which the copyrighted footage can be utilized, such as whether rebroadcasts are
14 permitted, and when and whether clips and highlights can be used in other programming); the
15 territories, media, and mediums in which broadcasts can be effected; promotion of the SEC and
16 its member institutions; academic programming; and terms of access of the broadcasters to
17 venues.

18 13. In many instances, the SEC attempts to negotiate terms with media entities
19 (including CBS and ESPN) that are materially different from the provisions and terms proposed
20 by those media entities. These negotiations often last many months, or even more than a year. If
21 CBS, ESPN, or other media entities with which the SEC may negotiate in the future fear that
22 their agreements with the SEC will become publicly available, the SEC’s ability to negotiate
23 favorable provisions will be materially compromised, because the media entities have often taken
24 the position that they will only offer a provision or compromise favorable to the SEC if the SEC

1 will keep the provision or compromise confidential, to prevent other rights holders (*i.e.*, other
2 conferences and entities licensing media rights) from requesting or insisting on the same
3 provisions. For this reason, among others, the SEC does not allow its broadcast media
4 agreements to become public.

5 14. The same concerns and principles apply to the SEC's financial documents,
6 including its annual audited financial statements. The SEC's financial statements are highly
7 detailed and specifically identify revenues and expenses associated with specific broadcast media
8 agreements or with agreements related to specific championship, tournament, post-season bowl,
9 or other events. Although the SEC's aggregate revenues and expenses are publicly available
10 (through its Form 990s, as an I.R.C. § 501(c)(3) organization), the SEC does not make detailed,
11 line-item financial information or its own internal valuation, allocation, or other accounting
12 processes and procedures available to the public in order to prevent being prejudiced in future
13 negotiations with media entities and other counterparties to agreements related to championship,
14 tournament, post-season bowl, and other events. The SEC provides great detail in its financial
15 statements concerning the terms of its media and other agreements and sources of revenue for the
16 benefit of the Presidents and Chancellors of its member institutions, who are the primary users of
17 the financial statements.

18 15. The same concerns and principles likewise apply to the SEC's commercial and
19 licensing contracts and proposed contracts with third-party entities. Like the SEC's broadcast
20 media agreements, these agreements and proposals are, to the best of my knowledge, specific to
21 the SEC. Revealing publicly the terms that the SEC negotiates or commands for these contracts
22 and contract proposals would materially compromise the SEC's position in future contract
23 negotiations.
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1 16. The SEC treats the information summarized above and set forth in detail on
2 Exhibit 1 as highly confidential. Not all employees of the SEC are permitted to access these
3 documents or the material they contain. The SEC does not share these documents with third
4 parties or the public. Moreover, the SEC's broadcast media agreements and, often, its other
5 commercial contracts include explicit confidentiality provisions prohibiting or significantly
6 limiting their public disclosure.

7 17. I understand that the Northern District of California has concluded that
8 "compelling reasons" exist to seal confidential "license agreements, financial terms, [and] details
9 of confidential licensing negotiations[.]" *Guzman v. Chipotle Mexican Grill, Inc.*, No. 17-cv-
10 02606-HSG, 2020 WL 1171112, at *1 (N.D. Cal. Mar. 11, 2020) (citation and internal quotation
11 marks omitted). I also understand that federal courts, including the Ninth Circuit, have
12 concluded that information, like financial information, that would harm a litigant's competitive
13 standing if made publicly available is properly subject to sealing. *See, e.g., Nixon v. Warner*
14 *Commc'ns, Inc.*, 435 U.S. 589, 598 (1978); *Ctr. for Auto Safety v. Chrysler Grp., LLC*, 809 F.3d
15 1092, 1097 (9th Cir. 2016). For the same reasons, the agreements and documents summarized
16 above and set forth in Exhibit 1 should remain sealed.

17 18. For the foregoing reasons, as well as those set forth in Exhibit 1, the SEC
18 respectfully submits that compelling reasons exist to seal the information identified above, in
19 Exhibit 1 to this Declaration, and in the Proposed Order submitted with the Motion.
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1 Pursuant to 28 U.S.C. § 1746, I declare under penalty of perjury that the foregoing is true
2 and correct.

3 Executed on September 27, 2023.
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9 Charlie Hussey
10 COO & Deputy Commissioner, SEC
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Exhibit 1

to Declaration of Charlie Hussey

Plaintiffs' Motion for Class Certification, ECF No. 208				
Mot. to Seal Ex. 1 Entry Number	Page/Line	Confidentiality Level	Description	Compelling Basis for Sealing
8.	p. 8:17-20	NSC	The redacted text refers to the content of the representations and warranties and indemnification provisions in the SEC's broadcast media agreements.	Reveals the substance of terms in the SEC's broadcast agreements, which are highly negotiated, confidential, and competitively sensitive. If provisions or portions of those agreements were disclosed publicly, the SEC would be prejudiced when attempting to negotiate or renegotiate its broadcast agreements, which are unique to the SEC, in the future.
34.	p. 32 n.57	Highly Confidential – Counsel Only	The redacted text quotes from a letter that the SEC received from Collegiate Licensing Company, which sets forth the proposed terms, including financial terms, of the SEC's potential participation in an EA Sports college football video game through licensing of the SEC's intellectual property.	Reveals the content of confidential proposed terms of participation in a potential college football video game, including licensing and pricing terms offered to the SEC. Disclosure of the proposed terms could prejudice the SEC when attempting to negotiate this or similar licensing agreements.
Berman Declaration In Support of Plaintiffs' Motion for Class Certification, ECF No. 208-1				
Mot. to Seal Ex. 1 Entry Number	Page/Line	Confidentiality Level	Description	Reason for Sealing
58.	Ex. 51	Confidential	This exhibit is a letter that the SEC received from Collegiate Licensing	Reveals the content of confidential proposed terms of

			Company, which sets forth the proposed terms, including financial terms, of the SEC's potential participation in an EA Sports college football video game through licensing of the SEC's intellectual property.	participation in a potential college football video game, including licensing and pricing terms offered to the SEC. Disclosure of the proposed terms could prejudice the SEC when attempting to negotiate this or similar licensing agreements.
Expert Report of Daniel A. Rascher, ECF No. 209-2				
Mot. to Seal Ex. 1 Entry Number	Page/Line	Confidentiality Level	Description	Reason for Sealing
73 and 80.	p. 32, ¶ 60 & n.68	Confidential	The redacted text quotes from a letter that the SEC received from Collegiate Licensing Company, which sets forth the proposed terms, including financial terms, of the SEC's potential participation in an EA Sports college football video game through licensing of the SEC's intellectual property.	Reveals the content of confidential proposed terms of participation in a potential college football video game, including licensing and pricing terms offered to the SEC. Disclosure of the proposed terms could prejudice the SEC when attempting to negotiate this or similar licensing agreements.
150, 151, and 152.	pp. 76-77, ¶ 156 & n.174	NSC	The SEC is not requesting that this information be maintained under seal.	The SEC is not requesting that this information be maintained under seal.
172 and 174.	p. 88, ¶ 175 & n.202	NSC	The redacted text reveals the content of an SEC audited financial statement, which discloses the financial terms of the SEC's broadcast media agreement with ESPN.	Reveals in detail the financial terms in the SEC's broadcast agreements and revenues associated with specific broadcast agreements, which are highly negotiated, confidential, and competitively sensitive. The SEC

				does not make available detailed line-item information about the financial aspects of its broadcast media agreements, which are unique to the SEC, to prevent being prejudiced in future negotiations with broadcast entities.
177, 178, and 179.	pp. 90-91, Ex. 9 & n.208	NSC	The redacted chart purports to show the total annual broadcast media revenue generated by the SEC through its various broadcast media agreements, as well as its participation in the CFP, bowl games, and NCAA tournament events.	Reveals in detail the revenue the SEC derives from specific broadcast media agreements and events. This information is highly confidential and not publicly disclosed. It could be used to derive the total financial value of specific broadcast media agreements to which the SEC is a party. The SEC does not make available detailed line-item information about the financial aspects of its broadcast media or event agreements, which are unique to the SEC, to prevent being prejudiced in future negotiations with broadcast entities and other contract counterparties.
181.	p. 92, Ex. 10	NSC	The redacted portions of the chart show Plaintiffs' alleged broadcast NIL damages by conference and by sport, which information could be used in connection with publicly available information to reveal the financial terms	In connection with publicly disclosed information, reveals in detail the revenue the SEC derives from specific broadcast media agreements. This information is highly confidential and not

			of specific SEC broadcast media agreements.	publicly disclosed. It could be used to derive the total financial value of specific broadcast media agreements to which the SEC is a party. The SEC does not make available detailed line-item information about the financial aspects of its broadcast media agreements, which are unique to the SEC, to prevent being prejudiced in future negotiations with broadcast entities.
182.	p. 93, Ex. 11	NSC	The redacted portions of the chart show the number of putative class members by conference and by sport, which could be used in connection with other information to reveal the financial terms of specific SEC broadcast media agreements.	In connection with other information included in the parties' filings, reveals in detail the revenue the SEC derives from specific broadcast media agreements. This information is highly confidential and not publicly disclosed. It could be used to derive the total financial value of specific broadcast media agreements to which the SEC is a party. The SEC does not make available detailed line-item information about the financial aspects of its broadcast media agreements, which are unique to the SEC, to prevent being prejudiced in future negotiations with broadcast entities.
183.	p. 94, Ex. 12	NSC	The redacted portions of the chart show alleged broadcast NIL damages by	In connection with other information included in the

			conference, by sport, and per player, disclosure of which could reveal the financial terms of specific SEC broadcast media agreements.	parties' filings, reveals in detail the revenue the SEC derives from specific broadcast media agreements. This information is highly confidential and not publicly disclosed. It could be used to derive the total financial value of specific broadcast media agreements to which the SEC is a party. The SEC does not make available detailed line-item information about the financial aspects of its broadcast media agreements, which are unique to the SEC, to prevent being prejudiced in future negotiations with broadcast entities.
197.	p. 130, App'x C.8	NSC	The redacted portions of the chart show the financial terms of and revenue derived from specific SEC broadcast media agreements, bowl agreements, College Football Playoff agreements, and NCAA tournament agreements.	Reveals in detail the revenue the SEC derives from specific broadcast media agreements and broadcast events. This information is highly confidential and not publicly disclosed. It could be used to derive the total financial value of specific broadcast media agreements and event agreements to which the SEC is a party. The SEC does not make available detailed line-item information about the financial aspects of its broadcast media or event agreements, which are unique to the SEC, to prevent

				being prejudiced in future negotiations with broadcast entities and other contract counterparties.
Expert Report of Edwin Desser, ECF No. 209-3				
Mot. to Seal Ex. 1 Entry Number	Page/Line	Confidentiality Level	Description	Reason for Sealing
208.	p. 23 n.23	NSC	The redacted text quotes a provision of the SEC's media agreement with ESPN regarding promotional use of student-athlete NIL, revealing the substance of the confidential terms of that agreement.	Reveals the terms of the SEC's media agreement with ESPN, which are highly negotiated, confidential, and competitively sensitive. These provisions are unique to the SEC and their public disclosure would cause prejudice to the SEC in future negotiations with broadcast entities.
211.	p. 24, Sec. 6.5	NSC	The redacted text quotes a provision of the SEC's media agreement with ESPN regarding promotional use of student-athlete NIL, revealing the substance of the confidential terms of that agreement.	Reveals the terms of the SEC's media agreement with ESPN, which are highly negotiated, confidential, and competitively sensitive. These provisions are unique to the SEC and their public disclosure would cause prejudice to the SEC in future negotiations with broadcast entities.
215 and 217.	p. 25, Sec. 6.7 & n.31	NSC	The redacted text quotes a provision of the SEC's media agreement with ESPN regarding promotional use of student-	Reveals the terms of the SEC's media agreement with ESPN, which are highly negotiated, confidential, and competitively

			athlete NIL, revealing the substance of the confidential terms of that agreement.	sensitive. These provisions are unique to the SEC and their public disclosure would cause prejudice to the SEC in future negotiations with broadcast entities.
218, 219, and 221.	pp. 26-27, Sec. 6.7 & n.32	NSC	The redacted text quotes from the representations and warranties section of the SEC's media agreement with ESPN, revealing the substance of the confidential terms of that agreement.	Reveals the terms of the SEC's media agreement with ESPN, which are highly negotiated, confidential, and competitively sensitive. These provisions are unique to the SEC and their public disclosure would cause prejudice to the SEC in future negotiations with broadcast entities.
254 and 255.	p. 60, Sec. 17.1 & n.74	NSC	The redacted text quotes a portion of the SEC's 2018 audited financial statement, which reveals the revenue that the SEC derives from its broadcast media agreement with ESPN, as well as the conference's by-sport allocation of that revenue for accounting purposes, revealing the confidential financial terms of the SEC's ESPN agreement.	Reveals in detail the SEC's revenue derived from a specific broadcast media agreement, as well as financial and accounting allocations related to that agreement, which are confidential and competitively sensitive. The SEC does not make its financial statements available to the public, and disclosure of the SEC's broadcast revenue and valuation of its sport offerings for accounting purposes could prejudice the SEC in future media rights negotiations with broadcast entities.

Defs.' Opp. to Pls.' Mot. for Class Certification, ECF No. 249				
Mot. to Seal Ex. 1 Entry Number	Page/Line	Confidentiality Level	Description	Reason for Sealing
258.	p. 7:13	NSC	The redacted text conceals the identity of each A5 conference associated with the plaintiffs' per-player broadcast NIL damages numbers by sport, which information can be used in connection with publicly available information to reveal the financial terms of specific SEC broadcast media agreements.	In connection with publicly disclosed information, reveals in detail the revenue the SEC derives from specific broadcast media agreements. This information is highly confidential and not publicly disclosed. It could be used to derive the total financial value of specific broadcast media agreements to which the SEC is a party. The SEC does not make available detailed line-item information about the financial aspects of its broadcast media agreements, which are unique to the SEC, to prevent being prejudiced in future negotiations with broadcast entities.
267, 268, and 269.	p. 15:3, :5-7	NSC	The redacted text conceals information from the SEC's audited financial statement regarding the SEC's allocation of broadcast media revenues by sport for accounting purposes, as well as the amount of revenue the SEC receives from its media agreement with ESPN concerning the SEC Network.	Reveals in detail the SEC's revenue derived from a specific broadcast media agreement, as well as financial and accounting allocations related to that agreement, which are confidential and competitively sensitive. The SEC does not make its financial statements available to the public, and disclosure of the SEC's

				broadcast revenue and valuation of its sport offerings for accounting purposes could prejudice the SEC in future media rights negotiations with broadcast entities.
279.	p. 31:10	NSC	The redacted text conceals the plaintiffs' per-player BNIL damages amount for an SEC women's basketball student-athlete, which information can be used in connection with publicly available information to reveal the financial terms of specific SEC broadcast media agreements.	In connection with publicly disclosed information, reveals in detail the revenue the SEC derives from specific broadcast media agreements. This information is highly confidential and not publicly disclosed. It could be used to derive the total financial value of specific broadcast media agreements to which the SEC is a party. The SEC does not make available detailed line-item information about the financial aspects of its broadcast media agreements, which are unique to the SEC, to prevent being prejudiced in future negotiations with broadcast entities.
Decl. of Greg Sankey, ECF No. 249-1				
Mot. to Seal Ex. 1 Entry Number	Page/Line	Confidentiality Level	Description	Reason for Sealing
284 and 285.	pp. 12:23-24; 13:2-3	NSC	The redacted text discloses the substance of provisions of the SEC's broadcast media agreements with ESPN	Reveals the substance of terms in the SEC's broadcast agreements, which are highly negotiated, confidential, unique to the SEC,

			regarding the required distribution and exposure for SEC sports.	and competitively sensitive. If provisions or portions of those agreements were disclosed publicly, the SEC would be prejudiced when attempting to negotiate or renegotiate its broadcast agreements, which are unique to the SEC, in the future.
286.	p. 13:12-15	NSC	The redacted text discloses the substance of provisions of the SEC's broadcast media agreements with various media partners regarding game times.	Reveals the substance of terms in the SEC's broadcast agreements, which are highly negotiated, confidential, unique to the SEC, and competitively sensitive. If provisions or portions of those agreements were disclosed publicly, the SEC would be prejudiced when attempting to negotiate or renegotiate its broadcast agreements, which are unique to the SEC, in the future.
287.	p. 13:19-22	NSC	The redacted text discloses the substance of provisions of the SEC's broadcast media agreements with various media partners regarding the number and length of commercial spots.	Reveals the substance of terms in the SEC's broadcast agreements, which are highly negotiated, confidential, unique to the SEC, and competitively sensitive. If provisions or portions of those agreements were disclosed publicly, the SEC would be prejudiced when attempting to negotiate or renegotiate its broadcast agreements, which are unique to the SEC, in the future.

288.	p. 14:5-9	NSC	The redacted text discloses the substance of provisions of the SEC's broadcast media agreements with various media partners regarding the party that bears the cost of production for SEC sporting events.	Reveals the substance of terms in the SEC's broadcast agreements, which are highly negotiated, confidential, unique to the SEC, and competitively sensitive. If provisions or portions of those agreements were disclosed publicly, the SEC would be prejudiced when attempting to negotiate or renegotiate its broadcast agreements, which are unique to the SEC, in the future.
289.	p. 16:6	NSC	The redacted text reveals the SEC's by-sport allocation of revenue from its broadcast agreement with CBS, which is made for accounting purposes and appears in confidential SEC financial statements.	Reveals in detail financial and accounting allocations related to the SEC's broadcast agreements, which are confidential and competitively sensitive. The SEC does not make its financial statements available to the public, and disclosure of the SEC's valuation of its sport offerings for accounting purposes could prejudice the SEC in future media rights negotiations with broadcast entities related to the relative value of particular sports for purposes of broadcast agreements.
290.	p. 16:10-13	NSC	The redacted text reveals the SEC's by-sport allocation of revenue from its broadcast agreement with ESPN, which is made for accounting purposes and appears in confidential SEC financial statements.	Reveals in detail financial and accounting allocations related to the SEC's broadcast agreements, which are confidential and competitively sensitive. The SEC does not make its financial

				statements available to the public, and disclosure of the SEC's valuation of its sport offerings for accounting purposes could prejudice the SEC in future media rights negotiations with broadcast entities related to the relative value of particular sports for purposes of broadcast agreements.
291.	p. 16:14	NSC	The redacted text reveals the financial terms of and revenue derived from the SEC's broadcast agreement with ESPN concerning the SEC Network.	Reveals in detail the revenue the SEC derives from a specific broadcast media agreement. This information is highly confidential and not publicly disclosed. The SEC does not make available detailed line-item information about the financial aspects of its broadcast media agreements, which are unique to the SEC, to prevent being prejudiced in future negotiations with broadcast entities.
292.	p. 16:21-22	NSC	The redacted text reveals the content of SEC financial statements, as well as the financial terms of and revenue derived from the SEC's broadcast agreement with ESPN concerning the SEC Network.	Reveals in detail the revenue the SEC derives from a specific broadcast media agreement, as well as information about the SEC's internal financial accounting and by-sport allocations for accounting purposes. This information is highly confidential and not publicly disclosed. The SEC does not make available detailed line-

				item information about the financial aspects of its broadcast media agreements, which are unique to the SEC, to prevent being prejudiced in future negotiations with broadcast entities.
293.	p. 18:3-4	NSC	The redacted text reveals the substance of provisions of the SEC's broadcast media agreements with ESPN regarding the required distribution and exposure for SEC sports.	Reveals the substance of terms in the SEC's broadcast agreements, which are highly negotiated, confidential, unique to the SEC, and competitively sensitive. If provisions or portions of those agreements were disclosed publicly, the SEC would be prejudiced when attempting to negotiate or renegotiate its broadcast agreements, which are unique to the SEC, in the future.
Defs.' Daubert Mot. to Exclude Rascher and Desser, ECF No. 250				
Mot. to Seal Ex. 1 Entry Number	Page/Line	Confidentiality Level	Description	Reason for Sealing
305.	p. 4:22-25	NSC	The redacted text reveals information about the SEC's by-sport allocation of revenue from its broadcast media agreement with CBS for accounting purposes, as well as the financial terms of the SEC's broadcast agreement with ESPN concerning the SEC Network.	Reveals in detail the revenue the SEC derives from a specific broadcast media agreement, as well as information about the SEC's internal financial accounting and by-sport allocations for accounting purposes. This information is highly confidential and not

				publicly disclosed. The SEC does not make available detailed line-item information about the financial aspects of its broadcast media agreements, which are unique to the SEC, to prevent being prejudiced in future negotiations with broadcast entities.
305. (portion)	p. 4:26	NSC	The SEC is not requesting that this information be maintained under seal.	The SEC is not requesting that this information be maintained under seal.
307 and 308.	p. 13:3-8	NSC	The redacted text reveals information about the SEC's by-sport allocation of broadcast revenue from specific media agreements, as well as the financial terms of the SEC's broadcast agreement with ESPN concerning the SEC Network.	Reveals in detail the revenue the SEC derives from a specific broadcast media agreement, as well as information about the SEC's internal financial accounting and by-sport allocations for accounting purposes. This information is highly confidential and not publicly disclosed. The SEC does not make available detailed line-item information about the financial aspects of its broadcast media agreements, which are unique to the SEC, to prevent being prejudiced in future negotiations with broadcast entities.
308. (portion)	p. 13:9-10	NSC	The SEC is not requesting that this information be maintained under seal.	The SEC is not requesting that this information be maintained under seal.

Expert Report of Catherine Tucker, ECF No. 251-1				
Mot. to Seal Ex. 1 Entry Number	Page/Line	Confidentiality Level	Description	Reason for Sealing
331.	p. 12, ¶ 24(c)	NSC	The redacted material discloses the name of an SEC member school, which could be used in connection with publicly filed information to derive the value financial terms of the SEC's broadcast media agreements.	In connection with publicly disclosed information, reveals in detail the revenue the SEC derives from specific broadcast media agreements. This information is highly confidential and not publicly disclosed. It could be used to derive the total financial value of specific broadcast media agreements to which the SEC is a party. The SEC does not make available detailed line-item information about the financial aspects of its broadcast media agreements, which are unique to the SEC, to prevent being prejudiced in future negotiations with broadcast entities.
333.	p. 16, ¶ 25(e)	NSC	The SEC is not requesting that this information be maintained under seal.	The SEC is not requesting that this information be maintained under seal.
338, 339, and 340.	p. 46, ¶ 56 & n.105	NSC	The redacted text conceals the plaintiffs' per-player BNIL damages amount for an SEC men's basketball student-athlete, as well as the value of that per-player amount compared to damages amounts proposed for other A5 and non-A5 conferences, which can be used in	In connection with publicly disclosed information, reveals in detail the revenue the SEC derives from specific broadcast media agreements. This information is highly confidential and not publicly disclosed. It could be

			connection with publicly available information to reveal the financial terms of specific SEC broadcast media agreements.	used to derive the total financial value of specific broadcast media agreements to which the SEC is a party. The SEC does not make available detailed line-item information about the financial aspects of its broadcast media agreements, which are unique to the SEC, to prevent being prejudiced in future negotiations with broadcast entities.
341.	p. 47, tbl.2	NSC	The redacted table conceals the plaintiffs' per-player BNIL damages amount for an SEC men's basketball student-athlete, as well as the value of that per-player amount compared to damages amounts proposed for other A5 and non-A5 conferences, which can be used in connection with publicly available information to reveal the financial terms of specific SEC broadcast media agreements.	In connection with publicly disclosed information, reveals in detail the revenue the SEC derives from specific broadcast media agreements. This information is highly confidential and not publicly disclosed. It could be used to derive the total financial value of specific broadcast media agreements to which the SEC is a party. The SEC does not make available detailed line-item information about the financial aspects of its broadcast media agreements, which are unique to the SEC, to prevent being prejudiced in future negotiations with broadcast entities.
342 and 343.	p. 54, ¶ 63 & fig. 3	Confidential	See NCAA Declaration.	See NCAA Declaration.

344.	p. 56, ¶ 64	NSC	The redacted material reveals the relative financial value or total revenue of the SEC's broadcast media agreements compared to other A5 conferences.	This statement reveals information about the terms of the SEC's broadcast agreements relative to the agreements of other conferences, which is competitively sensitive and could be used to the SEC's detriment in future contract negotiations.
348 and 349	p. 67, tbl.5 & n.153	Confidential	The SEC is not requesting that this information be maintained under seal.	The SEC is not requesting that this information be maintained under seal.
351.	p. 68, ¶ 76	Confidential	The SEC is not requesting that this information be maintained under seal.	The SEC is not requesting that this information be maintained under seal.
352 and 353.	p. 68, tbl.6 & n.154	Confidential	The SEC is not requesting that this information be maintained under seal.	The SEC is not requesting that this information be maintained under seal.
354.	p. 69, n.155	NSC	The redacted material reveals the relative financial value or total revenue of the SEC's broadcast media agreements compared to other A5 conferences.	This statement reveals information about the terms of the SEC's broadcast agreements relative to the agreements of other conferences, which is competitively sensitive and could

				be used to the SEC's detriment in future contract negotiations.
355.	p. 71, tbl.7	Counsel Only	See NCAA Declaration.	See NCAA Declaration.
360 and 361.	p. 102, tbl.8 & notes	NSC	The redacted information conceals the dollar amount of the maximum proposed BNIL payments for SEC member schools, which can be used in connection with publicly disclosed information to reveal the financial terms of specific SEC broadcast media agreements.	In connection with publicly disclosed information, reveals in detail the revenue the SEC derives from specific broadcast media agreements. This information is highly confidential and not publicly disclosed. It could be used to derive the total financial value of specific broadcast media agreements to which the SEC is a party. The SEC does not make available detailed line-item information about the financial aspects of its broadcast media agreements, which are unique to the SEC, to prevent being prejudiced in future negotiations with broadcast entities.
371, 372, and 373.	pp. 115-16, figs. 7 & 8, with notes	Confidential	See TAMU Declaration.	See TAMU Declaration.

378.	p. 118, fig. 9	Confidential	See TAMU Declaration.	See TAMU Declaration.
386, 387, 388, 389, and 390.	pp. 127-28, ¶¶ 142-43 and nn. 323, 325, 326	NSC	The redacted material reveals the relative financial value or total revenue of the SEC's broadcast media agreements compared to other A5 conferences.	This statement reveals information about the terms of the SEC's broadcast agreements relative to the agreements of other conferences, which is competitively sensitive and could be used to the SEC's detriment in future contract negotiations.
397 and 398.	p. 138, ¶ 154 & n.348	Confidential; NSC	The redacted text reveals information reported by the SEC's member schools to the NCAA regarding their revenues. The redacted text also reveals the content of SEC audited financial statements, which set forth the SEC's relative allocation of value to certain sports for accounting and year-over-year comparison purposes.	Reveals confidential information regarding the SEC's member schools' revenue sources, which information is not available to the public, other conferences, or NCAA member institutions at a conference- or school-specific level. Also reveals information about the SEC's allocations of broadcast revenue for accounting purposes, which are confidential and competitively sensitive. Disclosure of this information could prejudice the SEC in future media rights negotiations with broadcast entities, as well as reveal competitively valuable information about the revenues generated by the SEC's member

				schools and the sources of those revenues.
399.	p. 139 tbl.9	Confidential	See NCAA Declaration.	See NCAA Declaration.
401.	p. 141 n.352	NSC	The redacted material reveals the relative financial value or total revenue of the SEC's broadcast media agreements compared to other A5 conferences.	This statement reveals information about the terms of the SEC's broadcast agreements relative to the agreements of other conferences, which is competitively sensitive and could be used to the SEC's detriment in future contract negotiations.
402.	p. 142 n.353	NSC	The redacted material reveals the relative financial value or total revenue of the SEC's broadcast media agreements compared to other A5 conferences.	This statement reveals information about the terms of the SEC's broadcast agreements relative to the agreements of other conferences, which is competitively sensitive and could be used to the SEC's detriment in future contract negotiations.
403.	p. 144 n.363	NSC	The redacted material reveals the relative financial value or total revenue of the SEC's broadcast media agreements compared to other A5 conferences.	This statement reveals information about the terms of the SEC's broadcast agreements relative to the agreements of other conferences, which is competitively sensitive and could be used to the SEC's detriment in future contract negotiations.

409, 410, 411, and 412.	pp. 151-52, ¶¶ 168(a), (b) & nn. 386, 389	Counsel Only	The SEC is not requesting that this information be maintained under seal.	The SEC is not requesting that this information be maintained under seal.
437.	p. 197, ¶ 237	Counsel Only	See LSU Declaration.	See LSU Declaration.
438 and 439.	p. 189, tbl.12 & n.522	Counsel Only	See LSU Declaration.	See LSU Declaration.
444 and 445.	p. 201 tbl.13 & n.530	Counsel Only	See NCAA Declaration.	See NCAA Declaration.
446.	p. 202, ¶ 243	Counsel Only	See NCAA Declaration.	See NCAA Declaration.
454 and 455.	p. 204, ¶ 244	Counsel Only	See LSU Declaration.	See LSU Declaration.
456.	p. 204, ¶ 245	Counsel Only	The SEC is not requesting that this information be maintained under seal.	The SEC is not requesting that this information be maintained under seal.

458.	p. 204 n.540	Counsel Only	The SEC is not requesting that this information be maintained under seal.	The SEC is not requesting that this information be maintained under seal.
459.	p. 204 n.541	Confidential	See University of Alabama Declaration.	See University of Alabama Declaration.
463 and 464.	pp. 209-10, ¶ 250 & n.550	Counsel Only	See University of Alabama Declaration.	See University of Alabama Declaration.
465 and 466.	p. 211, ¶ 251(b) & n.555	Counsel Only	See University of Kentucky Declaration	See University of Kentucky Declaration.
470 and 471.	p. 214, ¶ 254(a) & n.565	Counsel Only	See University of Kentucky Declaration.	See University of Kentucky Declaration.
472 and 473.	p. 215, ¶ 254(b) & n.566	Counsel Only	See UGA Declaration.	See UGA Declaration.
474 and 477.	p. 218, ¶ 257 & n.575	Counsel Only	The SEC is not requesting that this information be maintained under seal.	The SEC is not requesting that this information be maintained under seal.
483.	p. 219, ¶ 259	Counsel Only	The SEC is not requesting that this information be maintained under seal.	The SEC is not requesting that this information be maintained under seal.

484 and 489.	pp. 219-20, ¶ 259(a) & n.579	Counsel Only	See Vanderbilt University Declaration.	See Vanderbilt University Declaration.
487 and 491.	p. 220, ¶ 259(c) & n.581	Counsel Only	See University of Alabama Declaration.	See University of Alabama Declaration.
488 and 492.	p. 220 tbl. 15; n.582	Counsel Only	The SEC is not requesting that this information be maintained under seal.	The SEC is not requesting that this information be maintained under seal.
493 and 495.	p. 223, ¶ 263(a) & n.591	Counsel Only	See University of Alabama Declaration.	See University of Alabama Declaration.
508.	p. 226, ¶ 265	Counsel Only	The SEC is not requesting that this information be maintained under seal.	The SEC is not requesting that this information be maintained under seal.
512 and 513.	p. 227, tbl. 16 and n.603	Counsel Only	The SEC is not requesting that this information be maintained under seal.	The SEC is not requesting that this information be maintained under seal.
525.	p. 240, n.662	Confidential	The SEC is not requesting that this information be maintained under seal.	The SEC is not requesting that this information be maintained under seal.
536.	pp. 249-50, ¶ 296(a)	Counsel Only	See NCAA Declaration.	See NCAA Declaration.
537.	p. 250, ¶ 296(b)	Counsel Only	See NCAA Declaration.	See NCAA Declaration.

538.	p. 250, ¶ 296(b), (c)	Counsel Only	See NCAA Declaration.	See NCAA Declaration.
539 and 540.	p. 251 fig.16; n.679	Counsel Only	See NCAA Declaration.	See NCAA Declaration.
541 and 543.	p. 252, ¶ 297 & n.680	Counsel Only; NSC	The redacted information conceals the relative proposed value of the SEC's total BNIL damages payments compared to another A5 conference, which information could be used in connection with publicly disclosed information to reveal the value or financial terms of the SEC's broadcast media agreements.	In connection with publicly disclosed information, reveals in detail the revenue the SEC derives from specific broadcast media agreements. This information is highly confidential and not publicly disclosed. It could be used to derive the total financial value of specific broadcast media agreements to which the SEC is a party. The SEC does not make available detailed line-item information about the financial aspects of its broadcast media agreements, which are unique to the SEC, to prevent being prejudiced in future negotiations with broadcast entities.
542 and 544.	p. 252, ¶ 300 and n.682	Confidential	The SEC is not requesting that this information be maintained under seal.	The SEC is not requesting that this information be maintained under seal.
545 and 546.	p. 254, ¶ 302 & n.687	Confidential	See University of Alabama Declaration.	See University of Alabama Declaration.
548.	p. 255 n.689	Confidential	The SEC is not requesting that this information be maintained under seal.	The SEC is not requesting that this information be maintained under seal.

Expert Report of Bob Thompson, ECF No. 251-2				
Mot. to Seal Ex. 1 Entry Number	Page/Line	Confidentiality Level	Description	Reason for Sealing
549.	p. 8, n.23	NSC	The redacted text cites to an SEC media agreement. In combination with unredacted text in the body of the report, the redacted material would disclose confidential terms of the SEC's agreements with broadcast media partners.	Reveals the substance of terms in the SEC's broadcast agreements, which are highly negotiated, confidential, and competitively sensitive. If provisions or portions of those agreements were disclosed publicly, the SEC would be prejudiced when attempting to negotiate or renegotiate its broadcast agreements, which are unique to the SEC, in the future.
550.	p.8, n.24	NSC	The redacted text cites to an SEC media agreement. In combination with unredacted text in the body of the report, revealing this information would disclose confidential terms of the SEC's agreements with broadcast media partners, specifically related to the SEC's representations and warranties.	Reveals the substance of terms in the SEC's broadcast agreements, which are highly negotiated, confidential, and competitively sensitive. If provisions or portions of those agreements were disclosed publicly, the SEC would be prejudiced when attempting to negotiate or renegotiate its broadcast agreements, which are unique to the SEC, in the future.
551.	p. 9, ¶ 3	NSC	The redacted text relates to substantive terms of the SEC's broadcast media agreement concerning the SEC Network and the transfer and licensing of rights in connection with that agreement.	Reveals the substance of terms in the SEC's broadcast agreements, which are highly negotiated, confidential, and competitively sensitive. If provisions or portions of those agreements were

				disclosed publicly, the SEC would be prejudiced when attempting to negotiate or renegotiate its broadcast agreements, which are unique to the SEC, in the future.
552 and 553.	p. 9, ¶ 4	NSC	The redacted text relates to the provisions of the SEC's broadcast media agreement concerning the SEC Network and ownership of that Network.	Reveals the substance of terms in the SEC's broadcast agreements, which are highly negotiated, confidential, and competitively sensitive. If provisions or portions of those agreements were disclosed publicly, the SEC would be prejudiced when attempting to negotiate or renegotiate its broadcast agreements, which are unique to the SEC, in the future.
555.	p. 9, n.25		The redacted text relates to the provisions of the SEC's broadcast media agreement concerning the SEC Network, the obligations imposed by that agreement, and the terms of operation of the Network.	Reveals the substance of terms in the SEC's broadcast agreements, which are highly negotiated, confidential, and competitively sensitive. If provisions or portions of those agreements were disclosed publicly, the SEC would be prejudiced when attempting to negotiate or renegotiate its broadcast agreements, which are unique to the SEC, in the future.
556.	p. 10, ¶ 1	NSC	The redacted information concerns the broadcast rights and related broadcast media agreement between the SEC, other FBS conferences, and ESPN for the College Football Playoff, the disclosure of which would reveal	Reveals the substance of terms in the CFP broadcast agreements, to which the SEC is a party, and which are highly negotiated, confidential, and competitively sensitive. If provisions or

			competitively sensitive and confidential information about the terms and operation of the CFP broadcast agreement.	portions of those agreements were disclosed publicly, the SEC would be prejudiced when attempting to negotiate or renegotiate its CFP-related agreements
569, 572, 573, and 574.	pp. 12-13 & nn. 38-40	NSC	The redacted information discloses terms and conditions of the SEC's broadcast media agreements with CBS and ESPN, including terms related to game selection, production and telecasting obligations, distribution requirements, and game broadcasting obligations.	Reveals the substance of terms in the SEC's broadcast agreements, which are highly negotiated, confidential, unique to the SEC, and competitively sensitive. If provisions or portions of those agreements were disclosed publicly, the SEC would be prejudiced when attempting to negotiate or renegotiate its broadcast agreements, which are unique to the SEC, in the future.
577 and 581.	p. 14, ¶ 1 & n.43	NSC	The redacted material discloses information about the SEC's exclusive sponsorship agreement.	Reveals the substance of terms in the SEC's master sponsorship agreement, which are highly negotiated, confidential, unique to the SEC, and competitively sensitive. If provisions or portions of those agreements were disclosed publicly, the SEC would be prejudiced when attempting to negotiate or renegotiate its sponsorship agreements, which are unique to the SEC, in the future.
584.	p. 15, n.48	NSC	The redacted material discloses trademark licensing terms of the SEC's	Reveals the substance of terms in the SEC's broadcast agreements, which are highly negotiated,

			broadcast media agreement relating to the SEC Network.	confidential, unique to the SEC, and competitively sensitive. If provisions or portions of those agreements were disclosed publicly, the SEC would be prejudiced when attempting to negotiate or renegotiate its broadcast agreements, which are unique to the SEC, in the future.
585.	p. 15, n.49	NSC	The redacted material discloses confidential information about provisions of the SEC's media rights agreements governing data rights	In combination with publicly disclosed information, the redacted material would reveal confidential and competitively sensitive information about the SEC's media rights agreements, which are highly negotiated and unique to the SEC. If provisions or portions of those agreements were disclosed publicly, the SEC would be prejudiced when attempting to negotiate or renegotiate its broadcast agreements, which are unique to the SEC, in the future.
586.	p. 16, ¶ 3	NSC	The redacted material discloses the terms in the SEC's media rights agreement with ESPN regarding the distribution of SEC games.	Reveals the substance of terms in the SEC's broadcast agreements, which are highly negotiated, confidential, unique to the SEC, and competitively sensitive. If provisions or portions of those agreements were disclosed publicly, the SEC would be prejudiced when attempting to

				negotiate or renegotiate its broadcast agreements, which are unique to the SEC, in the future.
588.	p. 16, n.50	NSC	The redacted material is a statement from the SEC's media agreements with ESPN concerning the operation of the SEC's website and other digital content and related contractual obligations.	Reveals the substance of terms in the SEC's broadcast agreements, which are highly negotiated, confidential, unique to the SEC, and competitively sensitive. If provisions or portions of those agreements were disclosed publicly, the SEC would be prejudiced when attempting to negotiate or renegotiate its broadcast agreements, which are unique to the SEC, in the future.
589.	p. 16, n.51	NSC	The redacted material reveals the specific terms of the SEC's media agreement with ESPN regarding commercial promotions during SEC game broadcasts.	Reveals the substance of terms in the SEC's broadcast agreements, which are highly negotiated, confidential, unique to the SEC, and competitively sensitive. If provisions or portions of those agreements were disclosed publicly, the SEC would be prejudiced when attempting to negotiate or renegotiate its broadcast agreements, which are unique to the SEC, in the future.
595, 596 and 597.	p. 18, n.57	NSC	The redacted text details the scope of the SEC's broadcast license to CBS through the parties' broadcast media agreement.	Reveals the substance of terms in the SEC's broadcast agreement with CBS, which are highly negotiated, confidential, unique to the SEC, and competitively sensitive. If provisions or

				portions of those agreements were disclosed publicly, the SEC would be prejudiced when attempting to negotiate or renegotiate its broadcast agreements, which are unique to the SEC, in the future.
598, 599, and 601.	pp. 18-19 & nn. 58-60	NSC	The redacted text details the contractually negotiated and agreed-upon method for game selection in the SEC's broadcast media rights agreements with CBS and ESPN.	Reveals the substance of terms in the SEC's broadcast agreements, which are highly negotiated, confidential, unique to the SEC, and competitively sensitive. If provisions or portions of those agreements were disclosed publicly, the SEC would be prejudiced when attempting to negotiate or renegotiate its broadcast agreements, which are unique to the SEC, in the future.
603.	pp. 19-20, n.62	NSC	The redacted text quotes from the SEC's broadcast media agreement with ESPN regarding the scope of SEC member schools' production rights and ESPN's contractual obligations related to distribution.	Reveals the substance of terms in the SEC's broadcast agreements, which are highly negotiated, confidential, unique to the SEC, and competitively sensitive. If provisions or portions of those agreements were disclosed publicly, the SEC would be prejudiced when attempting to negotiate or renegotiate its broadcast agreements, which are unique to the SEC, in the future.
604.	pp. 20-21, n.63	NSC	The redacted text provides detailed information about the terms and scope of the advertising provisions in the	Reveals the substance of terms in the SEC's broadcast agreements, which are highly negotiated,

			SEC's broadcast media rights agreements with ESPN.	confidential, unique to the SEC, and competitively sensitive. If provisions or portions of those agreements were disclosed publicly, the SEC would be prejudiced when attempting to negotiate or renegotiate its broadcast agreements, which are unique to the SEC, in the future.
605.	p. 21, n.64	NSC	The redacted text provides detailed information about the terms and limitations of the permissible subject matter of advertisements as agreed upon in the SEC's broadcast media agreements.	Reveals the substance of terms in the SEC's broadcast agreements, which are highly negotiated, confidential, unique to the SEC, and competitively sensitive. If provisions or portions of those agreements were disclosed publicly, the SEC would be prejudiced when attempting to negotiate or renegotiate its broadcast agreements, which are unique to the SEC, in the future.
606.	p. 21, n.66	NSC	The redacted text provides detailed information about the terms of ESPN's game broadcasting obligations pursuant to its broadcast media agreement with the SEC.	Reveals the substance of terms in the SEC's broadcast agreements, which are highly negotiated, confidential, unique to the SEC, and competitively sensitive. If provisions or portions of those agreements were disclosed publicly, the SEC would be prejudiced when attempting to negotiate or renegotiate its broadcast agreements, which are unique to the SEC, in the future.

607.	p. 21, n.67	NSC	The redacted text provides detailed information about the obligations of the SEC's broadcast media partners pursuant to their agreements with the SEC.	Reveals the substance of terms in the SEC's broadcast agreements, which are highly negotiated, confidential, unique to the SEC, and competitively sensitive. If provisions or portions of those agreements were disclosed publicly, the SEC would be prejudiced when attempting to negotiate or renegotiate its broadcast agreements, which are unique to the SEC, in the future.
608.	p. 22, n.68	NSC	The redacted text provides detailed information about ESPN's obligations related to shoulder programming under its broadcast media agreement with the SEC.	Reveals the substance of terms in the SEC's broadcast agreements, which are highly negotiated, confidential, unique to the SEC, and competitively sensitive. If provisions or portions of those agreements were disclosed publicly, the SEC would be prejudiced when attempting to negotiate or renegotiate its broadcast agreements, which are unique to the SEC, in the future.
609.	p. 22, n.69	NSC	The redacted text provides detailed information regarding the game window provisions of the SEC's broadcast media agreements with ESPN.	Reveals the substance of terms in the SEC's broadcast agreements, which are highly negotiated, confidential, unique to the SEC, and competitively sensitive. If provisions or portions of those agreements were disclosed publicly, the SEC would be prejudiced when attempting to

				negotiate or renegotiate its broadcast agreements, which are unique to the SEC, in the future.
610.	p. 23, ¶ 2	NSC	In conjunction with information available in public filings, the redacted text provides detailed information about the rights fees negotiated by the SEC in connection with certain of its broadcast media agreements.	Reveals the substance of terms in the SEC's broadcast agreements, which are highly negotiated, confidential, unique to the SEC, and competitively sensitive. If provisions or portions of those agreements were disclosed publicly, the SEC would be prejudiced when attempting to negotiate or renegotiate its broadcast agreements, which are unique to the SEC, in the future.
611.	p. 23, n.70	NSC	The redacted text provides detailed information regarding the game window provisions of the SEC's broadcast media agreements with CBS.	Reveals the substance of terms in the SEC's broadcast agreements, which are highly negotiated, confidential, unique to the SEC, and competitively sensitive. If provisions or portions of those agreements were disclosed publicly, the SEC would be prejudiced when attempting to negotiate or renegotiate its broadcast agreements, which are unique to the SEC, in the future.
616.	p. 24, n.76	NSC	The redacted text provides detailed information about the network rights provisions of the SEC's broadcast media agreement with ESPN.	Reveals the substance of terms in the SEC's broadcast agreements, which are highly negotiated, confidential, unique to the SEC, and competitively sensitive. If provisions or portions of those

				agreements were disclosed publicly, the SEC would be prejudiced when attempting to negotiate or renegotiate its broadcast agreements, which are unique to the SEC, in the future.
617 and 622.	p. 25, ¶ 2 & n.78	NSC	The redacted text provides detailed information about the game broadcasting provisions of the SEC's broadcast media agreements with ESPN.	Reveals the substance of terms in the SEC's broadcast agreements, which are highly negotiated, confidential, unique to the SEC, and competitively sensitive. If provisions or portions of those agreements were disclosed publicly, the SEC would be prejudiced when attempting to negotiate or renegotiate its broadcast agreements, which are unique to the SEC, in the future.
627.	p. 26, n.85	NSC	The SEC is not requesting that this information be maintained under seal.	The SEC is not requesting that this information be maintained under seal.
645.	p. 48, ¶ 1	NSC	The redacted text discloses information about the revenue structure of the SEC's broadcast media agreements.	Reveals the substance of terms in the SEC's broadcast agreements, which are highly negotiated, confidential, unique to the SEC, and competitively sensitive. If provisions or portions of those agreements were disclosed publicly, the SEC would be prejudiced when attempting to negotiate or renegotiate its broadcast agreements, which are unique to the SEC, in the future.

649, 650, and 651.	p. 51, ¶ 3	NSC	The redacted text reveals the content of an SEC audited financial statement, which discloses the SEC's relative allocation of value to certain sports for accounting and year-over-year comparison purposes.	Reveals in detail financial and accounting allocations related to the SEC's broadcast agreements, which are confidential and competitively sensitive. The SEC does not make its financial statements available to the public, and disclosure of the SEC's valuation of its sport offerings for accounting purposes could prejudice the SEC in future media rights negotiations with broadcast entities related to the relative value of particular sports for purposes of broadcast agreements.
652.	p. 51, ¶ 4	NSC	The redacted text reveals the content of an SEC audited financial statement, which discloses the SEC's relative allocation of value to certain sports for accounting and year-over-year comparison purposes.	Reveals in detail financial and accounting allocations related to the SEC's broadcast agreements, which are confidential and competitively sensitive. The SEC does not make its financial statements available to the public, and disclosure of the SEC's valuation of its sport offerings for accounting purposes could prejudice the SEC in future media rights negotiations with broadcast entities related to the relative value of particular sports for purposes of broadcast agreements.
653.	p. 52, ¶ 1	NSC	The redacted text reveals the content of an SEC audited financial statement, which discloses the SEC's relative	Reveals in detail financial and accounting allocations related to the SEC's broadcast agreements,

			allocation of value to certain sports for accounting and year-over-year comparison purposes.	which are confidential and competitively sensitive. The SEC does not make its financial statements available to the public, and disclosure of the SEC's valuation of its sport offerings for accounting purposes could prejudice the SEC in future media rights negotiations with broadcast entities related to the relative value of particular sports for purposes of broadcast agreements.
661 and 662.	p. 53, ¶ 5	NSC	The redacted text reveals the content of an SEC audited financial statement, which discloses the SEC's relative allocation of value to certain sports for accounting and year-over-year comparison purposes.	Reveals in detail financial and accounting allocations related to the SEC's broadcast agreements, which are confidential and competitively sensitive. The SEC does not make its financial statements available to the public, and disclosure of the SEC's valuation of its sport offerings for accounting purposes could prejudice the SEC in future media rights negotiations with broadcast entities related to the relative value of particular sports for purposes of broadcast agreements.
Expert Report of Barbara Osborne, ECF No. 251-3				
Mot. to Seal Ex. 1 Entry Number	Page/Line	Confidentiality Level	Description	Reason for Sealing

664a.	p. 12, ¶ 25	NSC	The redacted text conceals the identity of each A5 conference associated with the plaintiffs' per-player broadcast NIL damages numbers by sport, which information may be used in connection with publicly available information to reveal the financial terms of specific SEC broadcast media agreements.	In connection with publicly disclosed information, reveals in detail the revenue the SEC derives from specific broadcast media agreements. This information is highly confidential and not publicly disclosed. It could be used to derive the total financial value of specific broadcast media agreements to which the SEC is a party. The SEC does not make available detailed line-item information about the financial aspects of its broadcast media agreements, which are unique to the SEC, to prevent being prejudiced in future negotiations with broadcast entities.
664.	p. 54, ¶ 134(a)	NSC	The redacted text conceals the total amounts of revenue that the SEC derives from its broadcast media agreements, which could be used to reveal the financial terms of specific SEC broadcast media agreements.	Could reveal in detail the revenue the SEC derives from specific broadcast media agreements. This information is highly confidential and not publicly disclosed. It could be used to derive the total financial value of specific broadcast media agreements to which the SEC is a party. The SEC does not make available detailed line-item information about the financial aspects of its broadcast media agreements, which are unique to

				the SEC, to prevent being prejudiced in future negotiations with broadcast entities.
665.	p. 54, ¶ 134(b)	NSC	The redacted text conceals the amounts of SEC broadcast revenue distributed to each SEC member institution, which could be used to reveal the financial terms of specific SEC broadcast media agreements.	Could reveal in detail the revenue the SEC derives from specific broadcast media agreements. This information is highly confidential and not publicly disclosed. It could be used to derive the total financial value of specific broadcast media agreements to which the SEC is a party. The SEC does not make available detailed line-item information about the financial aspects of its broadcast media agreements, which are unique to the SEC, to prevent being prejudiced in future negotiations with broadcast entities.
Kilaru Decl. Ex. 6, Desser Tr. Excerpts, ECF No. 251-6				
Mot. to Seal Ex. 1. Entry Number	Page/Line	Confidentiality Level	Description	Reason for Sealing
667.	p. 37:6-12	NSC	The redacted text reveals information regarding the promotion provisions of the SEC's broadcast agreement with ESPN.	Reveals the substance of terms in the SEC's broadcast agreements, which are highly negotiated, confidential, unique to the SEC, and competitively sensitive. If provisions or portions of those agreements were disclosed publicly, the SEC would be

				prejudiced when attempting to negotiate or renegotiate its broadcast agreements, which are unique to the SEC, in the future.
668.	p. 39:4-8	NSC	The redacted text reveals information regarding the game distribution provisions of the SEC's broadcast agreements with ESPN.	Reveals the substance of terms in the SEC's broadcast agreements, which are highly negotiated, confidential, unique to the SEC, and competitively sensitive. If provisions or portions of those agreements were disclosed publicly, the SEC would be prejudiced when attempting to negotiate or renegotiate its broadcast agreements, which are unique to the SEC, in the future.
669.	pp. 45:10-46:14	NSC	The redacted text reveals information regarding the scope of the SEC's broadcast media agreements with CBS and ESPN, as well as the game time and distribution provisions of those agreements.	Reveals the substance of terms in the SEC's broadcast agreements, which are highly negotiated, confidential, unique to the SEC, and competitively sensitive. If provisions or portions of those agreements were disclosed publicly, the SEC would be prejudiced when attempting to negotiate or renegotiate its broadcast agreements, which are unique to the SEC, in the future.
670.	p. 50:6-11	NSC	The redacted text reveals information regarding the production cost provisions of the SEC's broadcast agreement with ESPN.	Reveals the substance of terms in the SEC's broadcast agreements, which are highly negotiated, confidential, unique to the SEC, and competitively sensitive. If

				provisions or portions of those agreements were disclosed publicly, the SEC would be prejudiced when attempting to negotiate or renegotiate its broadcast agreements, which are unique to the SEC, in the future.
671.	pp. 94:25-95:12	NSC	The redacted text reveals the content of an SEC audited financial statement, which discloses the SEC's relative allocation of value to certain sports for accounting and year-over-year comparison purposes.	Reveals in detail financial and accounting allocations related to the SEC's broadcast agreements, which are confidential and competitively sensitive. The SEC does not make its financial statements available to the public, and disclosure of the SEC's valuation of its sport offerings for accounting purposes could prejudice the SEC in future media rights negotiations with broadcast entities related to the relative value of particular sports for purposes of broadcast agreements.
672.	p. 96:13-16	NSC	The redacted text reveals the content of an SEC audited financial statement, which discloses the SEC's relative allocation of value to certain sports for accounting and year-over-year comparison purposes.	Reveals in detail financial and accounting allocations related to the SEC's broadcast agreements, which are confidential and competitively sensitive. The SEC does not make its financial statements available to the public, and disclosure of the SEC's valuation of its sport offerings for accounting purposes could prejudice the SEC in future media

				rights negotiations with broadcast entities related to the relative value of particular sports for purposes of broadcast agreements.
673.	p. 97:3-5	NSC	The redacted text reveals the content of an SEC audited financial statement, which discloses the SEC's relative allocation of value to certain sports for accounting and year-over-year comparison purposes.	Reveals in detail financial and accounting allocations related to the SEC's broadcast agreements, which are confidential and competitively sensitive. The SEC does not make its financial statements available to the public, and disclosure of the SEC's valuation of its sport offerings for accounting purposes could prejudice the SEC in future media rights negotiations with broadcast entities related to the relative value of particular sports for purposes of broadcast agreements.
674.	pp. 97:25-99:17	NSC	The redacted text reveals the financial terms of the SEC's broadcast agreement with CBS, as well as the SEC's by-sport allocation of the revenue generated by that agreement for accounting purposes.	Reveals in detail the revenue the SEC derives from a specific broadcast media agreement, as well as the financial and accounting allocations related to the SEC's broadcast agreements, which are confidential and competitively sensitive. The SEC does not make its financial statements or broadcast media revenue information available to the public, and disclosure of this information could prejudice the SEC in future media rights

				negotiations with broadcast entities.
675 and 676.	pp. 99:25-100:2, 100:6-10	NSC	The redacted text reveals the content of an SEC audited financial statement, which discloses the SEC's relative allocation of value to certain sports for accounting and year-over-year comparison purposes.	Reveals in detail financial and accounting allocations related to the SEC's broadcast agreements, which are confidential and competitively sensitive. The SEC does not make its financial statements available to the public, and disclosure of the SEC's valuation of its sport offerings for accounting purposes could prejudice the SEC in future media rights negotiations with broadcast entities related to the relative value of particular sports for purposes of broadcast agreements.
677 and 678.	p. 101:2-13, 20-22	NSC	The redacted text reveals the content of an SEC audited financial statement, which discloses the SEC's relative allocation of value to certain sports for accounting and year-over-year comparison purposes.	Reveals in detail financial and accounting allocations related to the SEC's broadcast agreements, which are confidential and competitively sensitive. The SEC does not make its financial statements available to the public, and disclosure of the SEC's valuation of its sport offerings for accounting purposes could prejudice the SEC in future media rights negotiations with broadcast entities related to the relative

				value of particular sports for purposes of broadcast agreements.
681.	pp. 114:13-119:19	NSC	The redacted text reveals information from the SEC's audited financial statement regarding its allocation of broadcast revenue by sport for accounting purposes, as well as the financial terms of the SEC's broadcast agreement with ESPN concerning the SEC Network.	Reveals in detail the revenue the SEC derives from a specific broadcast media agreement, as well as the financial and accounting allocations related to the SEC's broadcast agreements, which are confidential and competitively sensitive. The SEC does not make its financial statements or broadcast media revenue information available to the public, and disclosure of this information could prejudice the SEC in future media rights negotiations with broadcast entities.
Kilaru Decl. Ex. 7, Rascher Tr. Excerpts, ECF No. 251-7				
Mot. to Seal Ex. 1 Entry Number	Page/Line	Confidentiality Level	Description	Reason for Sealing
685.	p. 67:6-9	NSC	The redacted text conceals the plaintiffs' per-player BNIL damages amount for an SEC football student-athlete, which can be used in connection with publicly available information to reveal the financial terms of specific SEC broadcast media agreements.	In connection with publicly disclosed information, reveals in detail the revenue the SEC derives from specific broadcast media agreements. This information is highly confidential and not publicly disclosed. It could be used to derive the total financial

				value of specific broadcast media agreements to which the SEC is a party. The SEC does not make available detailed line-item information about the financial aspects of its broadcast media agreements, which are unique to the SEC, to prevent being prejudiced in future negotiations with broadcast entities.
687.	p. 68:8-13	NSC	The redacted text conceals the plaintiffs' per-player BNIL damages amount for an SEC football student-athlete, which can be used in connection with publicly available information to reveal the financial terms of specific SEC broadcast media agreements.	In connection with publicly disclosed information, reveals in detail the revenue the SEC derives from specific broadcast media agreements. This information is highly confidential and not publicly disclosed. It could be used to derive the total financial value of specific broadcast media agreements to which the SEC is a party. The SEC does not make available detailed line-item information about the financial aspects of its broadcast media agreements, which are unique to the SEC, to prevent being prejudiced in future negotiations with broadcast entities.
692.	p. 69:6-16	NSC	The redacted text conceals the plaintiffs' per-player BNIL damages amount for an SEC football student-athlete, which can be used in connection with publicly available information to	In connection with publicly disclosed information, reveals in detail the revenue the SEC derives from specific broadcast media agreements. This information is

			reveal the financial terms of specific SEC broadcast media agreements.	highly confidential and not publicly disclosed. It could be used to derive the total financial value of specific broadcast media agreements to which the SEC is a party. The SEC does not make available detailed line-item information about the financial aspects of its broadcast media agreements, which are unique to the SEC, to prevent being prejudiced in future negotiations with broadcast entities.
693.	p. 72:18-20	NSC	The redacted text conceals the plaintiffs' per-player BNIL damages amount for an SEC football student-athlete, which can be used in connection with publicly available information to reveal the financial terms of specific SEC broadcast media agreements.	In connection with publicly disclosed information, reveals in detail the revenue the SEC derives from specific broadcast media agreements. This information is highly confidential and not publicly disclosed. It could be used to derive the total financial value of specific broadcast media agreements to which the SEC is a party. The SEC does not make available detailed line-item information about the financial aspects of its broadcast media agreements, which are unique to the SEC, to prevent being prejudiced in future negotiations with broadcast entities.

695 and 696.	pp. 72:25-73:13	NSC	The redacted text conceals the plaintiffs' per-player BNIL damages amount for an SEC football student-athlete, which can be used in connection with publicly available information to reveal the financial terms of specific SEC broadcast media agreements.	In connection with publicly disclosed information, reveals in detail the revenue the SEC derives from specific broadcast media agreements. This information is highly confidential and not publicly disclosed. It could be used to derive the total financial value of specific broadcast media agreements to which the SEC is a party. The SEC does not make available detailed line-item information about the financial aspects of its broadcast media agreements, which are unique to the SEC, to prevent being prejudiced in future negotiations with broadcast entities.
705.	p. 133:8-10	NSC	Redactions conceal information from the SEC's audited financial statements regarding the SEC's by-sport allocation of broadcast revenue for accounting purposes.	Reveals financial and accounting allocations related to the SEC's broadcast agreements, which are confidential and competitively sensitive. The SEC does not make its financial statements or broadcast media revenue information available to the public, and disclosure of this information could prejudice the SEC in future media rights negotiations with broadcast entities.

706.	p. 133:16-17	NSC	Redactions conceal information from the SEC's audited financial statements regarding the SEC's by-sport allocation of broadcast revenue for accounting purposes.	Reveals financial and accounting allocations related to the SEC's broadcast agreements, which are confidential and competitively sensitive. The SEC does not make its financial statements or broadcast media revenue information available to the public, and disclosure of this information could prejudice the SEC in future media rights negotiations with broadcast entities.
708.	pp. 135:9-139:15	NSC	The redacted text reveals the content of an SEC audited financial statement, which discloses the SEC's relative allocation of value to certain sports for accounting and year-over-year comparison purposes, as well as the revenue the SEC derives from a specific broadcast media agreement.	Reveals in detail the revenue the SEC derives from a specific broadcast media agreement, as well as the financial and accounting allocations related to the SEC's broadcast agreements, which are confidential and competitively sensitive. The SEC does not make its financial statements or broadcast media revenue information available to the public, and disclosure of this information could prejudice the SEC in future media rights negotiations with broadcast entities.
712.	pp. 144:2-22	Counsel Only	The redacted text reveals information reported by the SEC's member schools to the NCAA regarding their revenues,	Reveals confidential information regarding the SEC's member schools' revenue sources, which information is not available to the

			which information is not available to the public.	public, other conferences, or NCAA member institutions at a conference- or school-specific level. This information could prejudice the SEC in future media rights negotiations with broadcast entities related to the valuation of particular sports, as well as reveal competitively valuable information about the revenues generated by the SEC's member schools and the sources of those revenues.
714.	p. 146:13-25	NSC	The SEC is not requesting that this information be maintained under seal.	The SEC is not requesting that this information be maintained under seal.
717.	pp. 156:2-157:2	NSC	The redacted text conceals the plaintiffs' per-player BNIL damages amount for an SEC football student-athlete, which can be used in connection with publicly available information to reveal the financial terms of specific SEC broadcast media agreements.	In connection with publicly disclosed information, reveals in detail the revenue the SEC derives from specific broadcast media agreements. This information is highly confidential and not publicly disclosed. It could be used to derive the total financial value of specific broadcast media agreements to which the SEC is a party. The SEC does not make available detailed line-item information about the financial aspects of its broadcast media agreements, which are unique to the SEC, to prevent being

				prejudiced in future negotiations with broadcast entities.
729.	pp. 201:17-202:4	NSC	The redacted text conceals the plaintiffs' per-player BNIL damages amount for an SEC men's basketball student-athlete, which can be used in connection with publicly available information to reveal the financial terms of specific SEC broadcast media agreements.	In connection with publicly disclosed information, reveals in detail the revenue the SEC derives from specific broadcast media agreements. This information is highly confidential and not publicly disclosed. It could be used to derive the total financial value of specific broadcast media agreements to which the SEC is a party. The SEC does not make available detailed line-item information about the financial aspects of its broadcast media agreements, which are unique to the SEC, to prevent being prejudiced in future negotiations with broadcast entities.
736.	p. 264:3-6	Counsel Only	The redacted text reveals information about a potential college football video game and the SEC's potential involvement in that game.	Discloses confidential information about the SEC's potential participation in a college football video game and the scope of that game.

Pls.' Reply Mem. In Support of Mot. for Class Certification, ECF No. 289				
Mot. to Seal Ex. 1 Entry Number	Page/Line	Confidentiality Level	Description	Reason for Sealing
751	p. 9:8-10	NSC	The SEC is not requesting that this information be maintained under seal.	The SEC is not requesting that this information be maintained under seal.
Berman Decl. In Further Support of Pls.' Mot. for Class Certification, ECF No. 289-1				
Mot. to Seal Ex. 1 Entry Number	Page/Line	Confidentiality Level	Description	Reason for Sealing
761.	Ex. 58, p. 120:4	NSC	The redacted text reveals the content of an SEC audited financial statement, which discloses the SEC's relative allocation of value to certain sports for accounting and year-over-year comparison purposes.	Reveals financial and accounting allocations related to the SEC's broadcast agreements, which are confidential and competitively sensitive. The SEC does not make its financial statements or broadcast media revenue information available to the public, and disclosure of this information could prejudice the SEC in future media rights negotiations with broadcast entities.
762.	Ex. 58, p. 120:15	NSC	The redacted text reveals the content of an SEC audited financial statement, which discloses the SEC's relative allocation of value to certain sports for accounting and year-over-year comparison purposes.	Reveals financial and accounting allocations related to the SEC's broadcast agreements, which are confidential and competitively sensitive. The SEC does not make its financial statements or broadcast media revenue

				information available to the public, and disclosure of this information could prejudice the SEC in future media rights negotiations with broadcast entities.
763.	Ex. 58, p. 121:4	NSC	The redacted text reveals the content of an SEC audited financial statement, which discloses the SEC's relative allocation of value to certain sports for accounting and year-over-year comparison purposes.	Reveals financial and accounting allocations related to the SEC's broadcast agreements, which are confidential and competitively sensitive. The SEC does not make its financial statements or broadcast media revenue information available to the public, and disclosure of this information could prejudice the SEC in future media rights negotiations with broadcast entities.
764.	Ex. 58, p. 123:19-22	NSC	The redacted text reveals the content of an SEC audited financial statement, which discloses the SEC's relative allocation of value to certain sports for accounting and year-over-year comparison purposes.	Reveals financial and accounting allocations related to the SEC's broadcast agreements, which are confidential and competitively sensitive. The SEC does not make its financial statements or broadcast media revenue information available to the public, and disclosure of this information could prejudice the SEC in future media rights negotiations with broadcast entities.

Desser Reply Report, ECF No. 289-2				
Mot. to Seal Ex. 1 Entry Number	Page/Line	Confidentiality Level	Description	Reason for Sealing
770, 771, and 774.	pp. 20-21, ¶ 4.3.1 and n. 66	NSC	The redacted text reveals the content of an SEC audited financial statement, which discloses the SEC's relative allocation of revenue from a specific broadcast media agreement to certain sports for accounting and year-over-year comparison purposes.	Reveals financial and accounting allocations related to a specific SEC broadcast agreements, which are confidential and competitively sensitive. The SEC does not make its financial statements or broadcast media revenue information available to the public, and disclosure of this information could prejudice the SEC in future media rights negotiations with broadcast entities.
772.	p. 21, ¶ 4.3.2	NSC	The redacted text reveals the content of an SEC audited financial statement, which discloses the SEC's relative allocation of revenue from a specific broadcast media agreement to certain sports for accounting and year-over-year comparison purposes.	Reveals financial and accounting allocations related to a specific SEC broadcast agreements, which are confidential and competitively sensitive. The SEC does not make its financial statements or broadcast media revenue information available to the public, and disclosure of this information could prejudice the SEC in future media rights negotiations with broadcast entities.

773.	p. 21, ¶ 4.3.3	NSC	The redacted text conceals information from the SEC's audited financial statement regarding its allocation of broadcast media revenues by sport for accounting purposes, as well as the amount of revenue the SEC receives from specific media agreements.	Reveals in detail the SEC's revenue derived from specific broadcast media agreements, as well as financial and accounting allocations related to that agreement, which are confidential and competitively sensitive. The SEC does not make its financial statements available to the public, and disclosure of the SEC's broadcast revenue and valuation of its sport offerings for accounting purposes could prejudice the SEC in future media rights negotiations with broadcast entities.
780.	p. 23, ¶ 4.3.6	NSC	The redacted text reveals the content of an SEC audited financial statement, which discloses the SEC's relative allocation of revenue from a specific broadcast media agreement to certain sports for accounting and year-over-year comparison purposes.	Reveals financial and accounting allocations related to the SEC's broadcast agreements, which are confidential and competitively sensitive. The SEC does not make its financial statements or broadcast media revenue information available to the public, and disclosure of this information could prejudice the SEC in future media rights negotiations with broadcast entities.
784.	p. 34	NSC	The SEC is not seeking to maintain under seal any information on p. 34 of the Desser reply report.	The SEC is not seeking to maintain under seal any information on p. 34 of the Desser reply report.

Pls.' Opp. to Defs.' Daubert Mot. to Exclude Rascher and Desser, ECF No. 291				
Mot. to Seal Ex. 1 Entry Number	Page/Line	Confidentiality Level	Description	Reason for Sealing
831.	p. 14:11-14	NSC	The redacted text reveals the content of an SEC audited financial statement, which discloses the SEC's relative allocation of revenue from a specific broadcast media agreement to certain sports for accounting and year-over-year comparison purposes.	Reveals financial and accounting allocations related to the SEC's broadcast agreements, which are confidential and competitively sensitive. The SEC does not make its financial statements or broadcast media revenue information available to the public, and disclosure of this information could prejudice the SEC in future media rights negotiations with broadcast entities.
833.	p. 14:24-25	Confidential	The redacted text reveals information regarding the relative value of SEC sports in the context of broadcast agreements and related revenue.	Reveals information regarding the SEC's relative valuation of sport offerings, which is confidential and competitively sensitive. The SEC does not make its financial statements or related allocations available to the public, and disclosure of this information could prejudice the SEC in future media rights negotiations with broadcast entities.